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January 11, 2011  
(PBW Project No. 1649)

VIA FEDERAL EXPRESS

Mr. Gary Miller  
Superfund Division, Region 6 (6SF-RA)  
Arkansas/Texas Section  
U.S. Environmental Protection Agency  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733

Ms. Rita Engblom, On-Scene Coordinator  
U.S. Environmental Protection Agency, Region 6  
Superfund Division (6SF-AP)  
1445 Ross Avenue, Suite 1200  
Dallas, Texas 75202-2733



625654

Re: December 2010 Monthly Report for UAO and December 2010 Monthly Report for  
Settlement Agreement, Gulfco Marine Maintenance Site, Freeport, Texas

Dear Mr. Miller and Ms. Engblom:

Pastor, Behling & Wheeler, LLC (PBW) has prepared this monthly report on behalf of the Respondents LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow) pursuant to Section XII, Paragraph 53 of the amended Unilateral Administrative Order (UAO) and Section VIII, Paragraph 41.a of the Administrative Settlement Agreement and Order on Consent for Removal Action (Settlement Agreement) for the above-referenced Site. As discussed in my telephone conversation with Mr. Miller on August 2, 2005, regarding the UAO, monthly status reports for a given month will be submitted by the 15<sup>th</sup> of the following month as required in Paragraph 53 of the UAO, rather than by the 10<sup>th</sup> of the following month as indicated in Appendix 1 of the Statement of Work (SOW) attached to the UAO. The Settlement Agreement requires submittal of a progress report by the 15<sup>th</sup> of every month.

In accordance with the UAO requirements for the Remedial Investigation/Feasibility Study (RI/FS) this report addresses the topics listed below:

1. Actions which have been taken toward achieving compliance with the UAO during the previous month – The following actions were taken during the previous month:
  - Risk Assessment activities (SOW Paragraph 37) detailed under Task 7 of the RI/FS Work Plan, including: (1) participation in a meeting with EPA and Texas Commission on Environmental Quality (TCEQ) representatives on December 1, 2010 to review Baseline Ecological Risk Assessment (BERA) data and discuss preparation of the BERA report; and (2) partial preparation of the Draft BERA

Report to be submitted to EPA by February 7, 2011. It was agreed at the December 1, 2010 meeting that the BERA data suggest that the toxicity observed in Site and reference samples is not due to Site-related chemicals of potential ecological concern in any media.

- Remedial Investigation Report activities (SOW Paragraph 39) detailed under Task 9 of the RI/FS Work Plan, including partial preparation of the Draft RI Report to be submitted to EPA by February 7, 2011.
- Feasibility Study activities (SOW Paragraph 44) detailed under Task 10 of the RI/FS Work Plan, including preparation and submittal of the Draft Remedial Alternatives Memorandum (RAM) to EPA on December 17.

2. Results of RI/FS sampling, tests, modeling and all other data (including raw data) received or generated by or on behalf of Respondents during the previous month – No new data were received or generated during the previous month.
3. Actions, data and plans which are scheduled for the next two months and other information relating to the progress of RI/FS work – The following actions are planned for the next two months:
  - Preparation and submittal of the Draft BERA Report; and
  - Preparation and submittal of the Draft RI Report.
4. Information regarding percentage of completion, all delays encountered or anticipated that may affect the future schedule for completion of the work required, and efforts made to mitigate those delays or anticipated delays – RI/FS activities are approximately 80% complete.

In accordance with the Settlement Agreement requirements, this report also addresses the topics listed below for the Removal Action:

1. Significant Removal Action developments during the preceding period, including actions performed and any problems encountered – The following actions were taken during the previous month:
  - Partial removal and off-site management of aboveground storage tank (AST) contents;
  - AST decontamination prior to demolition; and
  - Partial AST demolition and removal.
2. Removal Action analytical data received during the reporting period – No new analytical data were received during the previous month.
3. Removal Action developments anticipated during next reporting period, including a schedule of actions to be performed, anticipated problems, and planned resolutions of past or anticipated problems – Field activities, including tank content removal and off-site disposal, are anticipated to be completed by the end of January 2011. As described in my December 23, 2010 e-mail to Mr. Miller, visible impacts to the north containment area caliche floor were observed below Tank No. 6 during tank content removal activities. A proposed plan to address these and other observed impacts to

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the north containment area floor was submitted to Mr. Miller via e-mail on January 7, 2011 and was subsequently approved by Mr. Miller (via e-mail) on that date.

Thank you for the opportunity to submit this monthly report. Should you have any questions, please do not hesitate to contact me.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC



Eric F. Pastor, P.E.  
Principal Engineer

cc: Mr. Doug McReynolds – EA Engineering, Science and Technology  
Ms. Luda Voskov – Texas Commission on Environmental Quality  
Mr. Ray Merrell – Sequa Corporation  
Mr. John Eldridge – Haynes and Boone, LLP  
Mr. Donnie Belote - The Dow Chemical Company  
Mr. Allen Daniels - LDL Coastal Limited, LP  
Mr. F. William Mahley - Strasburger & Price, LLP  
Mr. James C. Morriss III - Thompson & Knight, LLP  
Ms. Elizabeth Webb - Thompson & Knight, LLP